

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-30019-MAP
	)	
ROBERT KNOWLES,	)	
Defendant.	)	
	)	

**MOTION TO ENLARGE TIME FOR FILING OF GOVERNMENT'S RESPONSE TO  
DEFENDANT'S REQUEST FOR DISCOVERY**

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests this Court to enlarge the time for filing of the government's response to Defendant's request for discovery from September 30, 2004 to October 6, 2004 at 2pm.

In support of this motion, the government states the following:

1. The undersigned Assistant U.S. Attorney assumed responsibility for this case, from Special Assistant U.S. Attorney James Goodhines, on September 10, 2004.
2. When responding to Defendant's Motion for Discovery, the undersigned Assistant U.S. Attorney noticed that automatic discovery had not been documented. To be certain that automatic discovery is complete, the undersigned Assistant U.S. Attorney and counsel for Defendant request additional time to complete the process.
3. The Defendant, through his counsel, Attorney Alan Jay

Black, has assented to this request by the government.

This request does not cause undue delay, and is in the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: s/ Paul Hart Smyth

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Paul Hart Smyth  
Assistant U.S. Attorney